

NEW YORK TRIBECA GROUP, LLC)

Civil Docket No. _____

Plaintiff,)

VERIFIED COMPLAINT

v.)

JOSEPH BARAK and LIGHTENING)
CONSULTING INC.)

Defendants.)

Plaintiff New York Tribeca Group, LLC (“Plaintiff”) hereby files its Complaint against Defendants Joseph Barak (“Barak”) and Lightning Consulting Inc. (“Lightening”) (together, “Defendants”) seeking injunctive relief and monetary damages as a result of Defendants’ breach of their contract with Plaintiff, stealing Plaintiff’s entire proprietary and trade secret Customer Relations Management (“CRM”) database and using it for Defendants’ own purposes, thereby intentionally misappropriating Plaintiff’s trade secrets and/or confidential information, and also competing and soliciting Plaintiff’s business relationships in breach of Defendants’ contract with Plaintiff.

PARTIES, JURISDICTION AND VENUE

1. Plaintiff is a New York Limited Liability Company, with a principal place of business at 40 Wall Street, 43rd Floor, New York, New York.
2. Defendant Lightning Consulting Inc. is a New Jersey Corporation with a registered office and principal place of business at 32-15 Garden View Terrace, Fair Lawn, New Jersey, 07410-4359. The sole incorporator and sole shareholder of Lightning is Joseph Barak who, upon information and belief, resides at that same address.